

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 12 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
MICHAEL P. WOODS, M.D. FOR WAVE 12**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Michael P. Woods for Ethicon Wave 1, Dkt. 2041 (motion), Dkt. 2043 (memorandum in support), Dkt. 2234 (reply); and, the reply brief filed in Ethicon Wave 3, Dkt. 3051 (reply). Plaintiffs respectfully request that the Court exclude Michael P. Woods' testimony, for the reasons expressed in the Wave 1 and 3 briefing. This notice applies to the following the Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 29, 2019

Respectfully submitted,

/s/ D. Renee Baggett

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## **EXHIBIT A**

Bettis, Adrea	2:13-cv-20911
Boland, Anneliese	2:13-cv-32278
Burgoyne, Janet	2:14-cv-28620
Chockley, Bonnie	2:16-cv-05701
Dorgan, Madenna K.	2:12-cv-03159
Drake, Janet	2:12-cv-08575
Foster, Kimberly Fromm	2:14-cv-02945
Hanifl, Julie	2:16-cv-05175
Martin, Teresa	2:13-cv-22047
Slusser, Aimee	2:13-cv-12013
Smith, Cherita	2:13-cv-15670
Tucker, Brenda	2:13-cv-16593

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
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